V01-132 1/01= 3-8 in box

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

ELMER CAMPBELL, et al.,

INTERNATIONAL PAPER,

SUN CAPITAL PARTNERS, INC.

Case No. C-1-01-527

J. Beckwith; Mag J. Hogan

Plaintiffs,

v.

SMART PAPERS

NOTICE OF FILING EXHIBITS

: IN SUPPORT OF PLAINTIFFS'

MEMORANDUM IN OPPOSITION

TO DEFENDANT SMART PAPERS

MOTION FOR SUMMARY

Defendants. : JUDGMENT UNDER SEAL

The Plaintiffs hereby give notice of filing Exhibits in Support of Plaintiffs' Memorandum in Opposition to Defendant Smart Papers Motion for Summary Judgment under seal pursuant to the Protective Order filed with the court on March 4, 2003.

Respectfully submitted,

Randolph H. Freking (0009158)

Mark W. Napier (0019700)

George M. Reul, Jr. (0069992)

FREKING & BETZ

Trial Attorneys for Plaintiffs

215 East Ninth Street, Fifth Floor

Cincinnati, OH 45202

(513) 721-1975

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was sent via ordinary U.S. mail service to the

following on this 3 day of October, 2003:

Counsel for Defendants Sun Capital Partners, Inc. and Smart Papers, LLC:

Robert J. Hollingsworth, Esq. CORS & BASSETT, LLC 537 East Pete Rose Way, Suite 400 Cincinnati, OH 45202 Phone: (513) 852-8229

and

Stanley F. Lechner, Esq. Margery Sinder Friedman, Esq. Laine M. Schwartz MORGAN, LEWIS & BOCKIUS, LLP 1111 Pennsylvania Avenue, NW Washington, DC 20004 Phone: (202) 739-5079

Counsel for Defendant International Paper Company:

W. Carter Younger, Esq. Vincent Miraglia, Esq. Tara N. Mora, Esq. (pro hac vice) Jessica E. Morrison, Esq. (pro hac vice) McGUIRE WOODS LLP 1050 Connecticut Avenue, NW, Suite 1200 Washington, DC 20036-5317 Phone: (202) 857-1704

and

Michael A. Roberts, Esq. GRAYDON HEAD & RITCHEY LLP 1900 Fifth Third Center 511 Walnut Street Cincinnati, OH 45202 Phone: (513) 629-2799